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5 United States District Court  
6 Eastern District of Washington  
7 (Honorable Chief Judge Stanley A. Bastian)

8 United States of America,  
9 Plaintiff,

No. 1:23-CR-02037-SAB-6  
Sentencing Memorandum

10 v.

11 Jamaal Antwan Pimms,  
12 Defendant(s).

13  
14 Jamaal Antwan Pimms, through counsel, Zachary L. Ayers of Ayers Law Firm,  
15 P.L.L.C., respectfully submits this sentencing memorandum.

16 **18 U.S.C. §3553(a)**

17  
18 18 U.S.C. §3553(a) sets out factors that are helpful to the Court when  
19 determining a sentence that is “sufficient but not greater than necessary” to comply  
20 with the purposes of the statute. The District Court may not presume that the  
21 guideline range is reasonable, nor should the guideline factors be given any more or  
22 less weight than any other. *United States v. Carty*, 520 F.3d 984, 991 (9<sup>th</sup> Cir. 2008) *en*  
23 *banc*, citing *Rita v. United States*, 127 S.Ct. 2456 (2007), *Gall v. United States*, 127 S.Ct.  
24 2833 (2007), and *Kimbrough v. United States*, 128 S.Ct. 558 (2007). The guidelines are  
25 only one factor to be taken into account in arriving at an appropriate sentence. *Id.*  
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1           **Nature of the Offense**

2           The nature of this offense is very serious. Mr. Pimms is apologetic to RS and  
3 her family. He recognizes that he should have reported RS's murder to federal  
4 authorities in 2018. RS was a friend of his. He accepts responsibility for his actions  
5 and how they have deeply affected RS's family and her sister.  
6

7           **History and Characteristics of the Defendant**

8           Mr. Pimms has had a long and significant addiction to controlled substances.  
9 He was heavily addicted to methamphetamine at the time of the offense and has  
10 PTSD and anxiety surrounding RS's death. He has a criminal history score of 1 and is  
11 in history category I. Time in custody has significantly changed Mr. Pimms' outlook on  
12 life and way of speaking, especially now that he has had significant distance from his  
13 drug addiction. He no longer mumbles when he talks and seeks to become a  
14 productive member of society and stay away from controlled substances.  
15

16           **To Promote Respect for the Law and To Afford Adequate Deterrence to**  
17 **Criminal Conduct and Protection of the Public**

18           A sentence of time served with a one-year term of supervised release is  
19 sufficient but not more than necessary to promote respect for the law. This sentence  
20 provides Mr. Pimms the opportunity to enter outpatient treatment, become employed  
21 with his father's business, reconnect with his children and distance himself from the  
22 bad influences he had in central Washington.  
23

24           **Plan of Action for Mr. Pimms on Supervised Release.**

25           If the Court sentences Mr. Pimms to time served, he has undergone a drug  
26

1 treatment assessment and is recommended to enter intensive outpatient treatment in  
2 the Auburn, Washington area. He plans to work for his father's business, JCL  
3 Logistics LLC, in Auburn, Washington upon release.  
4

5 **Conclusion**

6 Mr. Pimms respectfully requests the Court to sentence him to time served, a  
7 one-year term of supervised release, no fine, and a \$100 special penalty assessment.  
8

9 DATED this 5th day of May 2025.

10 Respectfully Submitted,

11 s/Zachary L. Ayers  
12 Zachary L. Ayers, WSBA#46496  
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**Service Certificate**

I hereby certify that on May 5, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Thomas Hanlon, Assistant United States Attorney.

s/Zachary L. Ayers  
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